UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

--- X

JENNIFER MANERA,

                           Plaintiff,

          -against-

THE CITY OF NEW YORK, POLICE
OFFICER JOHN DOE 1-10.

                        Defendants.

--- X

CIVIL CASE MANAGEMENT PLAN

12 CV 0722 (BMC)

COGAN, District Judge

       After consultation with counsel for the parties, the following Case Management

Plan is adopted. This plan is also a scheduling order pursuant to Federal Rules of Civil Procedure

16 and 26(f).

A.   The case is to be tried to a jury.

B.   Non-Expert Discovery:

      1.   The parties are to conduct discovery in accordance with the Federal Rules of Civil

            Procedure and the Local Rules of the Eastern District of New York. All non-

            expert discovery is to be completed by July 23, 2012 which date shall not be

            adjourned except upon a showing of good cause and further order of the Court.

            Interim deadlines for specific discovery activities may be extended by the parties

            on consent without application to the Court, provided the parties are certain that

            they can meet the discovery completion date.

            The parties shall list the contemplated discovery activities and anticipated

            completion dates in Attachment A, annexed hereto.

      2.   Joinder of additional parties must be accomplished by May 23, 2012.

3.   Amended pleadings may be filed without leave of the Court until <u>May 23, 2012.</u>

C.   For all causes of action seeking monetary damages, each party shall identify and quantify in Attachment B, annexed hereto, each component of damages alleged; or, if not known, specify and indicate by what date Attachment B shall be filed providing such information.

D.   Motions:

1.   Upon the conclusion of non-expert discovery, and no later than the date provided below, the parties may file dispositive motions. The parties shall agree to a schedule and promptly submit same for the Court's approval, providing for no more than three rounds of serving and filing papers: supporting affidavits and briefs, opposing affidavits and briefs, and reply affidavits and briefs.

2.   The last day for filing dispositive motions shall be <u>August 23, 2012.</u>

(Counsel shall insert a date 30 days after the completion date for non-expert discovery.)

a.   There shall be no cross-motions. Any motions not made by the agreed date shall, unless the Court orders otherwise, not be considered until after the timely-filed motion is determined.

b.   Papers served and filed by the parties shall conform to the requirements set out in the Court's Individual Practices.

E.   Any request for relief from a date provided in this Case Management Plan shall conform to the Court's Individual Practices and include an order, showing consents and disagreements of all counsel, setting out all dates that are likely to be affected by the

granting of the relief requested, and proposed modified dates. Unless and until the Court approves the proposed order, the dates provided in this Plan shall be binding.

F.   Pre-Trial Motions:

Applications for adjournments and for discovery or procedural rulings will reflect or contain the positions of all parties, as provided by the Court's Individual Rules, and are not to modify or delay the conduct of discovery or the schedules provided in this Case Management Plan except upon leave of the Court.

SO ORDERED.

Dated: Brooklyn, New York
       April ___, 2012

s/ BMC

_____
                U.S.D.J.

ATTACHMENT A

The Parties are to list the discovery activities (i.e., production of documents, number of depositions, requests to admit, interrogatories) and anticipated completion dates:

DISCOVERY ACTIVITIES	COMPLETION DATE
1. **Initial Disclosures Pursuant to Rule 26(a) of the Federal Rules of Civil Procedures**	**April 23, 2012**
2. **Interrogatories (Maximum 25) and Requests for Production of Documents**	**Served by May 23, ~~2011~~ 2012**
3. **Requests to Admit (Maximum 10)**	
4. **Depositions of Parties and Non-Parties (including treating M.D.'s if any)**	**July 23, ~~2011~~ 2012**
5.	
6.	
7.	
8.	
9.	
10.	

ATTACHMENT B

For all causes of action seeking monetary damages, each party shall identify and quantify each component of damages alleged:

1.   **PLAINTIFFS CLAIMS:**

2.   **COUNTERCLAIMS AND CROSS-CLAIMS:**

3.   **THIRD-PARTY CLAIMS:**